

February 22, 2022

By ECF

The Honorable Jesse M. Furman United States District Court Judge for the Southern District of New York Thurgood Marshall **United States Courthouse** 40 Foley Square New York, New York 10007

Elise M. Bloom Member of the Firm d +1.212.969.3410 f 212.969.2900 ebloom@proskauer.com www.proskauer.com

Re: Karine Travieso v. Major League Soccer, L.L.C. et al., No. 1:21-cv-06998-JMF

Dear Judge Furman:

We represent Defendants Major League Soccer, L.L.C., JoAnn Neale, and Gary Stevenson ("Defendants") in the above-captioned action. We write jointly with Plaintiff Karine Travieso ("Plaintiff") pursuant to Rule 1.F. of Your Honor's Individual Rules and Practices in Civil Cases and the Notice of Initial Pretrial Conference ordered by Your Honor on August 23, 2021 (ECF 10), to respectfully request a two-week extension from February 24, 2022 to March 10, 2022 for the parties to file a joint letter, as well as a proposed Civil Case Management Plan and Scheduling Order, and an adjournment of the initial pretrial conference scheduled for March 2, 2022.

The parties seek the adjournment and corresponding extension because the parties are still engaged in discussions in an effort to resolve the case and are making progress towards doing so, and the mediator facilitating those discussions has recently informed the parties that she is unavailable until the week of February 28. In the event the aforementioned discussions are successful, the initial conference and related submissions will not be necessary.

As noted above, the parties' next scheduled appearance is March 2, 2022, and the deadline for the pre-conference submissions is February 24. This is the parties' third request to adjourn these deadlines. The parties make the instant request in light of the mediator's unavailability until February 28, to allow them to continue discussions from the mediation and in an effort to conserve the Court's and parties' resources.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Elise M. Bloom

Elise M. Bloom

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cc: All Counsel of Record via ECF

Application GRANTED. The pretrial conference scheduled for March 2, 2022, is hereby ADJOURNED to **March 17, 2022 at 4:30 p.m.** The parties' joint letter will be due **March 10, 2022**. Further extensions are unlikely to be granted. The Clerk of Court is directed to terminate ECF No. 27. SO ORDERED.

February 22, 2022